

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

v.

ANTHONY BUCCI

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No. 04-cr-10194-RCL

HEARING REQUESTED

MOTION TO MODIFY TERMS AND CONDITIONS OF RELEASE

The defendant respectfully moves the Court to modify the terms and conditions of his release as follows:

By permitting him to engage in employment at Florentina Restaurant, 143 Main Street, Cambridge, Massachusetts each Monday through Friday from 10:00 A.M. to 3:00 P.M.

In support hereof, the defendant respectfully says:

1. He has secured an offer of employment from Florentina Restaurant as set forth in the attachment to this motion that will be mailed to the Clerk's office.
2. He has faithfully complied with all the conditions of his pretrial release since his release in August, 2004.
3. He has not worked in over a year, and needs to begin working to support his family and himself.
4. The job at Florentina Restaurant will be at a fixed location at fixed hours; therefore, he will be able to be monitored by Pretrial Services as easily as he has been monitored at home.
5. He is presumed to be innocent of the charges against him, and is looking forward to trial in order to be vindicated.

6. Co-conspirator and government cooperator Jon Minotti, who orchestrated the conspiracy charged in the indictment, and who has already admitted his guilt to the government, is completely at liberty, without electronic monitoring, and is able to pursue any of his interests, legal or illegal.

REQUEST FOR HEARING

The defendant respectfully requests a hearing on this motion, and estimates that the length thereof ought not to exceed one-half hour.

Anthony Bucci
By his attorney,

/s/Michael F. Natola

May 31, 2005

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing motion has been served the above date, electronically and by first class mail, upon Assistant U.S. Attorney John T. McNeil.

/s/ Michael F. Natola
